

Message

From: Griffin, Susan [Griffin.Susan@epa.gov]
Sent: 2/12/2014 9:50:47 PM
To: Greene, Nikia [Greene.Nikia@epa.gov]
Subject: RE: Independent Peer Review of the Health Study

Respond more slowly?

Just fyi, Roz plans to submit this report as a journal article to Environmental Health Perspectives. All journal articles are extensively peer reviewed by experts in the field prior to publication. Perhaps this can be used to address the questions below.

From: Greene, Nikia
Sent: Wednesday, February 12, 2014 12:04 PM
To: Vranka, Joe; Sparks, Sara; Elsen, Henry; Griffin, Susan
Subject: FW: Independent Peer Review of the Health Study

FYI: that didn't take long.

From: John Ray [mailto:bodinman2003@yahoo.com]
Sent: Wednesday, February 12, 2014 11:54 AM
To: Greene, Nikia
Cc: dpowers@bsb.mt.gov; ksullivan@bsb.mt.gov
Subject: Re: Independent Peer Review of the Health Study

Thank you for your response.
I will respond to your points in detail later.
I make four points immediately:

1. It was never as I understand CTEC's stated intention that Steve Ackerlund would fulfill the function of providing an independent peer review of the health study. Steve is a member of the working group who is there to provide access for CTEC into the health study development process. He was deemed "acceptable" by the working group which had rejected other nominees for various reasons that had nothing to do with qualifications. By definition, Steve has been involved in the production of the draft health study, so by definition he could not fulfill the function of providing an independent peer review. I am surprised EPA would make such an assertion.

2. Steve has a background in risk communication. We would suggest that EPA contract with an independent peer reviewer in the area of epidemiology and/or toxicology.

3. EPA had promised the Butte public that there would be an independent peer review of the draft before anything was finalized. Submitting an article after the fact and after the process has moved along, is not what EPA promised nor is it what the public wants. (It could take a journal a year or two to complete its publication review and there is no way of knowing what questions were asked as journal peer reviews are not public processes.) It was obvious that, given the events surrounding the formation of the "task force" to conduct the health study and the EPA reaction to Stacie Barry's report, what was needed was a review of the process, methodology and outcomes by an independent peer reviewer with no ties to EPA or MDEQ or a PRP. This is what we were assured at the beginning of the health study process. I am asking, as a citizen, that EPA keep its promise.

4. As a citizen, I look forward to seeing how, during the review of the draft study, environmental justice issues will be addressed.

I will have a detailed response later.

Dr. John W. Ray

On Wednesday, February 12, 2014 11:15 AM, "Greene, Nikia" <Greene.Nikia@epa.gov> wrote:
Dear Dr. Ray,

Thank you for your request. The EPA welcomes peer review and public involvement in the development of the public health study for Butte. This is why EPA has provided funding to CTEC to contract with an independent consultant to participate and provide input into the public health study process. If CTEC wishes to engage other contractors such as you mention in your email below, EPA welcomes and supports that input as well. As you are aware, EPA has been flexible throughout the entire process of the Health Study and is confident that scientific scrutiny has been addressed through credible peers including CTEC's technical advisor Steve Ackerlund and experts in the Community Advisory Committee. Additionally, the working group for the Health Study is made up of multi-stakeholder experts including EPA's Regional Toxicologist and ATSDR's Regional Medical Officer. The working group was developed in part as a review team of experts.

EPA is working to address other interests voiced by CTEC and other members of the public to provide for peer review and publishing. Atlantic Richfield has volunteered to have the study published in a scientific journal. EPA is confident that the working group process along with public review and comment throughout the process and during the public comment period will ensure that the health study is fully vetted.

The draft health study will be available to the public in late February, contingent upon addressing working group member comments including CTEC's. A public meeting will be held about mid way through the public comment period. A notice will be submitted into the Montana Standard, for the release of the draft and the public meeting. EPA has asked CTEC for feedback on the public meeting and is hopeful that we can finalize logistics for that meeting after CTEC's February meeting. EPA is grateful for the substantial contributions from CTEC thus far and encourages CTEC to continue its participation in the development of the current and future health studies directly and through technical advisors or other contractors it chooses to involve.

Thank you for your continued interests in and assistance with the public health study for Butte and the Superfund cleanup.

Sincerely,

Nikia

From: John Ray [<mailto:bodinman2003@yahoo.com>]
Sent: Monday, February 10, 2014 3:16 PM
To: Greene, Nikia; dpowers@bsb.mt.gov; ksullivan@bsb.mt.gov
Cc: bodinman2003@yahoo.com
Subject: Independent Peer Review of the Health Study

I wanted to follow up with you regarding an issue raised at the last CTEC meeting regarding an independent peer review of the health study draft.

Would the EPA be amendable to the following:

1. That CTEC identify several potential independent peer reviewers, such as those at the University of Pittsburgh School of Public Health, who would be qualified to conduct an independent peer review of the health study protocol, process, methodology and conclusions with a view as to offering an opinion as to the validity of the findings and the process. In addition, suggestions could be made for changes in the health study. Other interested parties could also identify independent parties who could conduct the peer review.
2. That EPA would contact one of the parties identified and contract with them to do an independent peer review of the health study process, methodology and results.
3. That CTEC, as well as other interested parties, be able to provide input to the independent peer reviewer as to what

questions we think the reviewer should consider as part of their independent peer review. Of course, the independent peer reviewer would not be obligated to consider input from CTEC or any other interested parties.

These matters were discussed at the last CTEC meeting which Nikia attended. The independent peer review to which I refer in this email would be conducted prior to any finalization of the current health study draft.

I look forward to hearing your response.

Thanks,
John Ray